

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE:

BONNIE ROSE,  
  
Debtor.

Case No. 19-64835-pmb  
Chapter 13

BONNIE ROSE,  
  
Plaintiff,  
v.

WVMF FUNDING LLC, RUBIN LUBLIN,  
LLC, AND MELISSA DAVEY, CHAPTER  
13 TRUSTEE,  
  
Defendants.

Adversary No. 19-05327-pmb

**WVMF FUNDING, LLC AND RUBIN LUBLIN, LLC'S  
MOTION TO DISMISS**

COMES NOW, WVFM Funding, LLC and Rubin Lublin, LLC (“WVMF” and “Rubin Lublin” individually, “Defendants” collectively), named defendants in the above styled action, and hereby move this Court to dismiss this matter for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1). In support of this Motion, the Defendants rely upon the arguments set forth in their Memorandum of Law, filed contemporaneously herewith.

WHEREFORE, Defendants pray for relief as follows:

- a) That this Court grant this Motion and dismiss the above-styled action for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1); and
- b) For any other relief that this Court deems just and proper.

Respectfully submitted, this 27th day of November 2018.

/s/ Bret J. Chaness

BRET J. CHANESS (GA Bar No. 720572)

**RUBIN LUBLIN, LLC**

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*Attorneys for WVMF Funding, LLC and  
Rubin Lublin, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 27th day of November 2019, caused a true and correct copy of the within and foregoing to be served via U.S. First Class mail to the following:

Bonnie Rose  
3019 Saint Andrews Court  
Jonesboro, GA 30236

/s/ Bret J. Chaness  
BRET J. CHANESS (GA Bar No. 720572)